

October 1, 2001

MEMORANDUM

TO: Jim Johnston, Administrator
Idaho Falls Regional Office

FROM: Eric Antrim, EIT *EDX*
State Office of Technical Services

SUBJECT: TIER II TECHNICAL ANALYSIS
T2-010546, Walters Ready Mix, Rexburg
(Concrete Batch Plant & Crusher Tier II Operating Permit Number 065-00004 Renewal)

PURPOSE

The purpose of this memorandum is to satisfy the requirements of IDAPA 58.01.01.400 (*Rules for the Control of Air Pollution in Idaho*) for issuing Tier II operating permits.

PROJECT DESCRIPTION

This permit renewal involved reviewing the technical analysis that was completed when this permit was first issued. An analysis of the regulations involved in the original permit was completed and lead to some rewriting to account for changes in the *Rules for the Control of Air Pollution in Idaho*. Also, the applicant's request for renewal stated that one emission unit, namely the diesel generator, is no longer part of this facility.

All references to the generator were removed from the permit. New opacity rules were applied which allow greater opacity. Compliance with the new grain-loading standard was demonstrated below using the US Environmental Protection Agency's Compilation of Air Pollution Emission Factors (AP42). The facility classification name has changed from A2 to SM, but the classification is the same.

All other changes to the original permit can be accounted for as grammatical or formatting changes.

SUMMARY OF EVENTS

On January 22, 2001, the Idaho Department of Environmental Quality (DEQ) received a letter requesting the renewal of Tier II Operating Permit Number 065-00004.

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DISCUSSION

1. Process Description

Walters Ready Mix, Inc., is located in Rexburg, Idaho. This Tier II operating permit covers the equipment used at their Rexburg facility. The facility consists of two major processes: sand and gravel processing and ready-mix concrete batching.

Emissions from the facility include those associated with crushing and screening rock material; material transport, handling, and storage; the silo filter vent; fuel storage tanks; and fugitive road dust.

The facility was installed on July 1, 1986. The applicant did not apply for or receive a permit to construct prior to construction. The crushing and screening process is subject to federal regulation in accordance with 40 CFR 60, Subpart OOO (Standards for Performance for Nonmetallic Mineral Processing Plants).

2. Area Classification

The concrete batching facility is located in Madison County, which is designated as being as unclassified for all National Ambient Air Quality Standards.

3. Emission Estimates

Since emissions are decreasing, no new estimates were required. The emissions of the generator were removed from the permit's appendix.

AP42 gives an emission factor for the silo of 0.27 pounds of particulate matter (PM) for every ton of concrete produced. IDAPA 58.01.01.710.08.c.iv requires emissions to be less than 0.3 pounds of PM for every ton of process weight. Therefore, compliance with the grain-loading standard is demonstrated.

4. Modeling

Since the only change was the removal of an emission unit, no new modeling was required.

5. Facility Classification

This facility is not a major facility as defined in IDAPA 58.01.01.008.14 because the facility's potential to emit is limited to less than 100 tons per year. The facility is not a designated facility as defined in IDAPA 58.01.01.25. The facility is subject to federal regulation in accordance with 40 CFR 60, Subpart OOO. The facility is classified as an SM source because the actual emissions of PM is less than 100 tons per year. The SIC codes for the facility are 1442 (Construction Sand and Gravel), and 3273 (Concrete Batching).

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6. Regulatory Review

The following rules and regulations have been reviewed for this permit analysis:

<u>IDAPA 58.01.01.400</u>	Procedures and requirements for Tier II operating permits
<u>IDAPA 58.01.01.470</u>	Permit application fees for Tier II permits
<u>IDAPA 58.01.01.577</u>	Ambient air quality standards for specific air pollutants
<u>IDAPA 58.01.01.625</u>	Visible emissions
<u>IDAPA 58.01.01.660</u>	Rules for control of fugitive dust
<u>IDAPA 58.01.01.710</u>	Grain loading for process equipment

7. AIRS Information

Since this facility has removed an emission unit, an update to the AIRS database is required. The information necessary to update the database is included as an appendix to this technical analysis.

FEES

In accordance with IDAPA 58.01.01.470, this facility is subject to an application fee \$500.00.

RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends that Walters Ready Mix be issued a Tier II operating permit for their concrete batching and crushing facility in Rexburg. Since there is no increase in emissions associated with this renewal, a public comment period is not required in accordance with IDAPA 58.01.01.404.04.

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FROM-IDAHO DEQ

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Appendix

AIRS Database Update Form

ABBREVIATED AIRS DATA ENTRY SHEET - CONCRETE BATCH PLANT & CRUSHER

Name of Facility: Walters Ready MixAIRS/Permit #: 065-00004Permit Issue Date: DATE

<u>Source/Emissions Unit Name</u> (25 spaces) (Please use name as indicated in permit)	<u>SCC #</u> (8 digit #)	<u>Air Program</u> (SIP/NESHAP/ NSPS/PSD/MACT)
Diesel Generator (REMOVE)	20200401	SIP

RETURN TO PAT RAYNE
AIRS-PT.LST (9/95)

Walters Ready Mix
065-00004
T2 PTO issued 10/17/01

AIRS INSTRUCTIONS:

AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NSPS (Part 63)	STATE (Part 60)	STATE (Part 63)	AREA CLASSIFICATION
POLLUTANT							Area Classification is Unclassifiable No Abatement
SO ₂	B						
NO _x	B						
CO	B						
PM ₁₀	SM		SM				
PT (Particulate)	SM		SM				
VOC	B						
THAP (Total HAPs)	B						
			ADDITIONAL SUPPLY				
			000				

AIRS/AFS CLASSIFICATION CODES:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

INSTRUCTIONS FOR AIRS/AFS FACILITY-WIDE CLASSIFICATION FORM:

1. State Implementation Plan (SIP)
 - 1.1 Using the AIRS/AFS Classification Codes listed above, classify ALL pollutants by code for the SIP air program. Do not list numerical ton-per-year values in the table. Use the classification codes only.
2. Prevention of Significant Deterioration (PSD)
 - 2.1 Using the AIRS/AFS Classification Codes listed above, classify by code each pollutant for which the existing facility is classified as a PSD major facility.
 - 2.2.1. When writing a PSD permit (i.e. a permit with potential to emit above 250 T/yr, or 100 T/yr in the case of listed facilities, and which requires BACT, PSD increment analysis, etc.), classify the PSD major pollutants "A".
 - 2.2.2. When specifically writing a synthetic minor PSD permit (i.e. a permit that limits a facility's potential to emit to less than 250 T/yr, or 100 T/yr in the case of listed facilities), classify the synthetic minor pollutant(s) "SM". (This option only applies if the facility's potential to emit is less than 250 T/yr, or 100 T/yr if the facility is a listed facility).
3. New Source Performance Standards (NSPS) – 40 CFR, Part 60
 - 3.1 Copy the classification code from the SIP column to the applicable NSPS pollutant(s) only.